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Attorneys for Plaintiffs:
First African Methodist Episcopal Church
of Los Angeles; FAME Assistance Corporation;
FAME Housing Corporation; FAME Management
Services Corporation.

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES, CENTRAL DISTRICT

FIRST AFRICAN METHODIST
EPISCOPAL CHURCH OF LOS ANGELES,
A CALIFORNIA NON-PROFIT
CORPORATION; **FAME ASSISTANCE**
CORPORATION, A CALIFORNIA NON-
PROFIT CORPORATION; **FAME HOUSING**
CORPORATION, A CALIFORNIA NON-
PROFIT CORPORATION; **FAME**
MANAGEMENT SERVICES
CORPORATION, A CALIFORNIA NON-
PROFIT CORPORATION,

PLAINTIFFS,

vs.

REV. DR. JOHN J. HUNTER, AN
INDIVIDUAL RESIDENT OF CALIFORNIA;
DENISE HUNTER, AN INDIVIDUAL
RESIDENT OF CALIFORNIA; **JUDGE IRMA**
BROWN DILLON, AN INDIVIDUAL
RESIDENT OF CALIFORNIA; **DEAN E.**
BROWN, AN INDIVIDUAL RESIDENT OF
CALIFORNIA; **ANNIE B. BOLDEN,** AN
INDIVIDUAL RESIDENT OF CALIFORNIA;
DONALD WILSON, AN INDIVIDUAL
RESIDENT OF CALIFORNIA; **ELMON BON**
LEGGETT, AN INDIVIDUAL RESIDENT OF
CALIFORNIA; **MELVILLE PERRY,** AN
INDIVIDUAL RESIDENT OF CALIFORNIA;
CONSTANCE FORTUNE, AN INDIVIDUAL

CASE NO.: BC 496747

UNLIMITED JURISDICTION

COMPLAINT FOR:

- 1. BREACH OF FIDUCIARY DUTY;**
- 2. BREACH OF FIDUCIARY DUTY;**
- 3. CLAIM AND DELIVERY;**
- 4. FRAUD- MISREPRESENTATION- CONCEALMENT;**
- 5. CONVERSION;**
- 6. PRELIMINARY AND PERMANENT INJUNCTION;**
- 7. APPOINTMENT OF A RECEIVER;**
- 8. ACCOUNTING;**
- 9. DECLARATORY RELIEF.**

DEMAND FOR JURY TRIAL

1 RESIDENT OF CALIFORNIA; AND DOES 1
2 THROUGH 50, INCLUSIVE,

3 DEFENDANTS.
4

5
6 Comes now, Plaintiffs First African Methodist Church of Los Angeles ("FAME"),
7 FAME Assistance Corporation, FAME Housing Corporation and FAME Management Services
8 Corporation (collectively "FAME Corporations"), and for their Complaint against Defendants,
9 allege as follows:

10 I. INTRODUCTION

11 1. This case represents a serious breach of fiduciary duty, self-dealing and gross
12 negligence by the Defendant directors and officers of FAME and FAME Corporations. FAME
13 is a premiere church in the Los Angeles religious community. FAME Corporations provide vital
14 social service to the residents of Los Angeles and aspiring businessmen. The Corporations
15 support community development, business development, health and housing services,
16 environmental and transportation services. Under the leadership of Reverend Cecil Murray,
17 FAME was charged with the responsibility to supervise, control and manage the affairs of the
18 FAME Corporations. FAME Corporations are non-profit corporations. The Pastor of FAME
19 serves as the Chairman of the Board and Chief Executive Officer of FAME and the FAME
20 Corporation. The directors of FAME Corporations are chosen at FAME's annual meeting.
21 Despite this established structure, Defendant Denise Hunter has attempted to seize control of the
22 FAME Corporations for her own personal gain.

23 2. When her husband, Defendant John Hunter, was transferred from FAME to Bethel
24 A. M. E. Church of San Francisco on October 28, 2012, Defendant Denise Hunter announced to
25 the 100 plus employees of the FAME Corporations that FAME and its new Pastor, Pastor J.
26 Edgar Boyd, were no longer involved in the governance of the FAME Corporations. She not the
27 new Pastor of FAME would now serve as the Chief Executive Officer of the FAME
28 Corporations. In direct violation of the By-Laws of the FAME Corporations, Denise Hunter

1 would now appoint the directors of FAME Corporation without the participation or authorization
2 of FAME.

3 3. While Reverend John Hunter served as the Pastor of FAME, Denise Hunter ran the
4 FAME Corporations as her own personal fiefdom. She and her husband dictated the affairs of
5 the FAME Corporations with the assistance of their small band of co-conspirator officers and
6 directors. Any dissent voiced by an employee of FAME Corporations would be silenced by the
7 employee's immediate dismissal. Recently, Denise Hunter removed the files and records of the
8 FAME Corporations from FAME offices to a FAME Corporation office building located at 1968
9 Adams Boulevard, Los Angeles, California (commonly referred to as FAME Renaissance.)
10 FAME's business and financial records remain under the control and custody of Denise Hunter.

11 4. One day after her husband was removed as the Pastor of FAME, Denise Hunter filed
12 documents with the Secretary of State of California appointing her the new agent for service of
13 process for the FAME Corporations further isolating the FAME Corporations from FAME and
14 controlling the flow of information regarding the corporations. She recently admitted to Pastor
15 Boyd that her coup is designed to sever any supervision, control and influence of FAME and
16 the African Methodist Episcopal Connectional Church over the FAME Corporations. Further,
17 she and her hand picked FAME Corporation directors will now choose the directors of FAME
18 Corporations.

19 5. Upon his arrival at FAME, Pastor Boyd discovered that FAME has over \$450,000 of
20 aged past due payables. There are recorded judgments against FAME in the amount of \$200,000
21 entered against FAME during the reign of Defendant John Hunter. This revelation is shocking
22 since FAME enjoyed a reputation as a solvent and successful religious institution. Under the
23 leadership of former Pastor John Hunter, FAME and FAME Corporations financial condition are
24 now in a precarious position. This prompted a review of FAME and FAME Corporation
25 financial records. What has been uncovered is disturbing. A cabal composed of a small group
26 of Stewards and Trustees of FAME have conspired and aided and abetted the Hunters in their
27 dictatorial control over FAME and the FAME Corporations for their own personal gain--both
28 financially and for self-aggrandizement. This lawsuit followed.

1 **II. BACKGROUND**

2 **FAME AND FAME CORPORATIONS**

3 6. FAME was organized in 1868 by a former slave, Biddy Mason. FAME opened its
4 doors in 1872. From 1972 to 2004, FAME was headed by Rev. Dr.. Cecil Murray. Under
5 Reverend Murray's leadership, the FAME Corporations were established to serve the Los
6 Angeles community. Due to Reverend Murray's efforts, FAME grew in membership from 700
7 to 17,000. The corporate structure of FAME Corporations was deliberately set up so that FAME
8 would supervise and control the affairs of the corporations. FAME was the most respected and
9 successful Church in Los Angeles. Indeed, FAME was the largest African Methodist Episcopal
10 Church west of the Mississippi. FAME provided leadership in the community and devoted itself
11 to assist and aid Los Angeles residents, especially the needy.

12 7. All that changed when Defendant Reverend John Hunter became the Pastor of FAME
13 in 2004. Membership of FAME declined dramatically. Charges of sexual harassment and a
14 devastating civil lawsuit contributed to tarnishing FAME's reputation and financial well-being.
15 Indeed, Defendant John Hunter admitted to the embezzlement of FAME funds through the
16 misuse of FAME credit cards. Reverend Hunter disregarded corporate formalities and the
17 procedures for the governance of local churches established by the African Methodist Episcopal
18 Connectional Church. He and his wife, Denise Hunter, caused the sale of several FAME
19 properties and FAME Corporation properties without following the mandatory procedures of the
20 African Methodist Episcopal Connectional Church. The whereabouts of the sale proceeds
21 remains a mystery. Reverend and Mrs. Hunter caused FAME to purchase a mansion in Encino,
22 California. Pastors that are transferred to another ministerial charge must vacate the prior
23 pastoral residence within 30 days. Despite Reverend Hunter's transfer, the Hunters continue to
24 reside at the \$2 million mansion.

25 8. Defendant John Hunter and Defendant Denise Hunter enlisted the assistance of FAME
26 corporate officials and FAME Corporation directors to carry out their transgressions.
27 Defendant Judge Irma Brown Dillon was a Steward of FAME and is a director of FAME
28 Corporations. Violating federal regulations, she caused FAME Assistance Corporation to loan

1 her husband, Randy Charles Dillon, two federal assistance loans. Defendant Dillon assisted
2 Reverend Hunter in his absolute control over the finances of FAME and conspired with
3 Defendant Denise Hunter in their attempt to seize control over the FAME Corporations.
4 Defendant Annie B. Bolden is a FAME Steward. She participated in assisting Reverend Hunter
5 in his control over FAME finances and failure to follow established A. M. E. procedures.
6 Defendant Donald Wilson is a FAME Trustee and a director of the FAME Corporations. He
7 participated in Denise Hunter's attempt to gain absolute control over FAME Corporations.
8 Defendant Elmon Bon Leggett was a Trustee of FAME. His daughter, a real estate broker,
9 handled the sale of FAME and FAME Corporation properties.

10 9. Defendant Melville Perry was a FAME Trustee and is a director of FAME
11 Corporations. He also aided and abetted the illicit activities of the Hunters. Defendant
12 Constance Fortune is a FAME Corporation director. She assisted Denise Hunter in her attempt
13 to isolate the corporations from FAME and to disregard the By-Laws of the FAME
14 Corporations. Defendant Dean E. Brown is the Director of Human Resources for FAME
15 Corporations. He is aiding and abetting Denise Hunter in violating FAME Corporation By-
16 Laws. Recently, Defendant Brown assisted Denise Hunter in removing records from FAME
17 Corporation headquarters. He also assisted Denise Hunter in removing files and records from
18 FAME facilities to FAME Corporation headquarters. FAME Corporation Defendants allowed
19 Defendant John Hunter to earn over \$49,000 of salary and reimbursement. No FAME
20 Corporation director is permitted to receive a salary.

21 10. FAME Corporations manage and administer HUD housing, local, state and federal
22 grants and financing. Federal funds must be used to provide loans to aspiring businesses.
23 FAME Corporations must match these federal funds. The matching funds are considered federal
24 loan funds. A review of the financial records of FAME Corporations confirms that Defendant
25 officers and directors of the Corporations have dipped into the matching funds to the tune of
26 \$150,000 to support the monthly operating expenses of the FAME Corporations. This violates
27 federal contracts with FAME Corporations and federal regulations. FAME Corporation
28 revenues have been in decline due to Denise Hunter's leadership. FAME Renaissance offices

1 gain revenue by leasing out office space to new companies established under the FAME
2 Corporation incubator program. At this time, there are too many vacancies at this building.
3 HUD housing units have been mismanaged as well. Occupancy at the HUD residential facilities
4 has dropped to dangerous levels. Accordingly, FAME Corporate revenues are minimal.

5 ***THE BOOK OF DISCIPLINE OF THE AFRICAN METHODIST***
6 ***EPISCOPAL CHURCH, 2008 ("DISCIPLINE").***

7 11. The *Discipline* establishes the procedures for the governance of a local A. M. E.
8 Church. A local church is headed by its Pastor. The Pastor is the Chairman of the local church's
9 Steward and Trustee Boards. The Steward and Trustee Boards are comparable to the officers
10 and directors of a typical corporation. Each local church must hold an annual conference to
11 appoint and vote on the composition of the Steward and Trustee Board and to report on church
12 finances. The Trustee Board oversees church property and encumbrances. The Steward Board
13 deals with church finances. Should a local church Trustee Board desire to sell church property,
14 the decision to sell must be approved by the regional conference and the District Conference
15 trustees. In effect, the *Discipline* provides the corporate By-Laws of each local church. Under
16 the administration of Defendant Reverend John Hunter, FAME annual meetings were not held,
17 finances remained a secret and the Trustee Board failed to follow procedures to obtain the
18 approval of FAME property sales from the regional (Southern California) Conference and the
19 District (Fifth Episcopal District.) Every church property is held in trust for the A. M. E.
20 Connectional Church.

21 **III. THE PARTIES**

22 12. FAME is a non-profit California 501 (c) (3) corporation located at 2270 South
23 Harvard Boulevard, Los Angeles, California 90018. It is one of the largest and well respected
24 African Methodist Episcopal Churches in the A. M. E. Connection

25 13. FAME Corporations are non-profit 501 (c) (3) California corporations. Their corporate
26 headquarters are located at 1968 West Adams Boulevard, Los Angeles, California 90018 and at
27 FAME facilities located at Hobart Street, Los Angeles, California.

28

1 14. Defendants Denise Hunter and Reverend John Hunter are residents of Encino,
2 California. They occupy FAME's pastoral residence.

3 15. Defendant Judge Irma Brown Dillon is a resident of Los Angeles, California. Defendant
4 Dean Brown is a resident of Englewood, California. Defendant Annie Bolden is a resident of
5 Culver City, California. Defendant Donald Wilson is a resident of Los Angeles, California. He
6 is a member of the State Bar of California. Defendant Elmon Bon Leggett is a resident of Los
7 Angeles, California. Defendant Melville Perry is a resident of Los Angeles, California and
8 Defendant Constance Fortune is a resident of Los Angeles, California.

9 16. Each Defendant aided and abetted one another in the transgressions reported in this
10 Complaint. Defendants were the agent of each other and conspired among themselves to
11 accomplish the breaches of fiduciary duties, conversion, claim and delivery and other causes of
12 action reported in this Complaint.

13 17. The identities of Defendants Does 1 through 50, inclusive, are not presently known to
14 Plaintiffs. As soon as their identities are ascertained, Plaintiffs will promptly seek leave to amend
15 this Complaint to identify these Doe Defendants.

16 **IV. JURISDICTION AND VENUE**

17 18. The acts alleged in this Complaint occurred and is occurring within this judicial district.
18 The Court has jurisdiction over the subject matter of this Complaint and venue is proper within
19 the Central District of this Court.

20 **VI. CAUSES OF ACTION**

21 **FIRST CAUSE OF ACTION**

22 **(By FAME against Defendants Rev. Hunter, Dillon, Bolden, Leggett, Wilson, and**
23 **Perry and Does 1 through 20, inclusive, for Breach of Fiduciary Duty)**

24 19. Plaintiff realleges each allegation contained in paragraphs 1 through 18 inclusive of
25 this Complaint as though fully set forth herein.

26 20. Defendants as Trustees and Stewards of FAME owed FAME the highest fiduciary
27 duties to avoid conflicts of interest, a duty of loyalty, honesty, to conform in all respects to the
28 *Discipline* and to act in the highest and best interests of FAME. Defendants have breached their

1 fiduciary duties owed to FAME by engaging in the acts and omissions alleged in this Complaint.

2 Specifically, Defendants have breached their fiduciary duties by, among other actions:

3 (a) Allowing Reverend Hunter to disregard the mandatory procedures for the governance
4 of FAME;

5 (b) Allowing Reverend Hunter to exclusively control the financial affairs of FAME;

6 (c) Allowing Reverend Hunter to fail to hold an annual conference;

7 (d) Allowing Reverend Hunter to sell Church properties without the authorization of
8 Conference and District Trustees;

9 (e) Allowing Reverend Hunter to squander FAME resources by purchasing a two million
10 dollar pastoral residence and furnishing the residence with furniture in the amount of \$250,000,
11 including construction;

12 (e) Allowing Defendant Denise Hunter to run the FAME Corporations as a dictator and
13 aiding and abetting and conspiring with Mrs. Hunter to attempt to seize exclusive control over
14 FAME Corporations;

15 (f) Allowing each of them to financially gain from their illicit activities;

16 (g) Allowing Reverend Hunter to embezzle FAME funds;

17 (h) Failure to supervise and control the finances of FAME;

18 (i) Failing to avoid conflicts of interest; and,

19 (j) Breaching their respective duty of loyalty owed to FAME.

20 21. As a direct and proximate result of the breaches of fiduciary duty owed by
21 Defendants to FAME, Defendants have been unjustly enriched and FAME has been damaged, in
22 a sum at least in excess of \$1 million, the exact amount to be proven at trial.

23 22. The acts and conduct of Defendants, as alleged, were oppressive, fraudulent and
24 malicious and in conscious disregard for the rights of FAME entitling FAME to an award of
25 punitive an exemplary damages against these Defendants in an amount to be proven at trial.

26 **SECOND CAUSE OF ACTION**

27 **(By FAME Corporations against Defendants Denise Hunter, Fortune, Brown,**
28 **Dillon, Perry, Wilson, Leggett and Does 1 through 10 for Breach of Fiduciary Duty)**

23. Plaintiffs reallege each allegation of paragraphs 1 through 22 inclusive of this Complaint as though fully set forth herein.

24. Defendants as directors and officers of FAME Corporations owe the FAME Corporations the highest fiduciary duties to avoid conflicts of interest, a duty of loyalty, honesty and to act in the highest and best interests of the FAME Corporations. Defendants have breached their fiduciary duties owed to FAME Corporation by engaging in the acts and omissions alleged in this Complaint. Specifically, defendants have breached their fiduciary duties by, among other actions:

- (a) Allowing Denise Hunter to seize control of FAME Corporations from FAME;
- (b) Allowing Denise Hunter to remove files and records from FAME facilities;
- (c) Aiding Denise Hunter in seizing control of FAME Board of Directors without FAME authorization and supervision and anointing herself the Chief Executive Officer of the FAME Corporations;
- (d) Allowing Denise Hunter to sell FAME Corporation assets without the approval of FAME;
- (e) Contributing to the decline of FAME Corporation revenues through failure to lease office space and HUD residential facilities;
- (f) Permitting Denise Hunter to loot the matching federal funds to cover FAME Corporation expenses;
- (g) Allowing Reverend Hunter to receive compensation in violation of FAME Corporation By-Laws;
- (h) Failure to follow the established By-Laws of the FAME Corporations; and,
- (i) Failure to control and manage the finances and government grant programs of FAME Corporations;
- (j) Breaching their duty of honesty and loyalty and exhibiting a conflict of interest in putting their own personal gain ahead of FAME Corporation interests.

25. As a direct and proximate result of the breaches of fiduciary duty owed by

1 Defendants to FAME Corporations, Defendants have been unjustly enriched and FAME
2 Corporations have been damaged, in a sum at least in excess of \$1 million, the exact amount to
3 be proven at trial.

4 26. The acts and conduct of Defendants, as alleged, were oppressive, fraudulent and
5 malicious and in conscious disregard for the rights of FAME Corporations entitling Plaintiffs to
6 an award of exemplary and punitive damages against these Defendants in an amount to be
7 proven at trial.

8 **THIRD CAUSE OF ACTION**

9 **(By all Plaintiffs against all Defendants for Fraud—Misrepresentation and**
10 **Concealment)**

11 27. Plaintiffs reallege each allegation of paragraphs 1 through 26 inclusive of this
12 Complaint as though fully set forth herein.

13 28. Defendants defrauded Plaintiffs by misrepresenting the financial condition of
14 Plaintiffs and concealing their material illicit activities such as failure to follow the *Discipline*,
15 failure to follow the By-Laws of FAME Corporations, conspiring with Reverend Hunter and
16 Denise Hunter to abscond with Plaintiffs revenues and failure to disclose the conspiracy to sever
17 FAME Corporations from FAME. At all times Plaintiffs were ignorant of the true material facts
18 intentionally misrepresented by Defendants and had no knowledge of Defendants' concealment.
19 At all relevant times, Defendants knew that their representations were false when made and
20 intended Plaintiffs to rely on these misrepresentations to their detriment. Plaintiffs at all relevant
21 times relied upon the representations of Defendants.

22 29. As a direct and proximate result of Defendants' fraudulent conduct, Plaintiffs have
23 sustained damages in an amount to be proven at trial.

24 30. The acts and conduct of Defendants were oppressive, fraudulent, malicious and in
25 conscious disregard for the rights of Plaintiffs, entitling Plaintiffs to an award of exemplary and
26 punitive damages against Defendants, the exact amount to be proven at trial.

27 **FOURTH CAUSE OF ACTION**

28 **(By FAME Corporations against Defendant John Hunter for Conversion)**

1 31. Plaintiffs reallege each allegation of paragraphs 1 through 30, inclusive, of this
2 Complaint as though fully set forth herein.

3 32. While the Pastor of FAME and the Chairman of the Board and Chief Executive
4 Officer of FAME Corporations, Defendant Reverend John Hunter paid himself \$49,000 of salary
5 and reimbursement in violation of the By-Laws of the FAME Corporations. The payments were
6 illegal and unauthorized and must be returned to FAME Corporations.

7 33. As a direct and proximate result of this conversion, Plaintiffs have sustained
8 damages in excess of \$49,000.

9 **FIFTH CAUSE OF ACTION**

10 **(By FAME against Defendant Denise Hunter for Claim and Delivery)**

11 34. Plaintiff realleges each allegation of paragraphs 1 through 33, inclusive, of this
12 Complaint as though set forth in full herein.

13 35. Plaintiff was and is the owner of its financial, administrative and corporate records.
14 Defendant Denise Hunter has custody and control of these FAME records at FAME Corporate
15 Headquarters. Plaintiff has been denied access to its records and Defendant has removed
16 Plaintiff's records from FAME facilities. Defendant is in wrongful possession of these records
17 in violation of Plaintiff's right to immediate and exclusive possession. Plaintiff has demanded
18 the return of these records and Defendant has denied access to Plaintiff to recover the records.
19 Plaintiff has lost the use of these records, which are vital to conducting its business activities.
20 Plaintiff has sustained damages as a direct and proximate result of Defendant's refusal to return
21 its records, the exact amount of damage to be proven at trial.

22 **SIXTH CAUSE OF ACTION**

23 **(By Plaintiffs against all Defendants for Declaratory Relief)**

24 36. Plaintiffs reallege each allegation contained in paragraphs 1 through 35, inclusive, of
25 this Complaint as though fully set forth herein.

26 37. An actual controversy has arisen and now exists between Plaintiffs and Defendants
27 concerning their respective rights, interests, and duties with respect to the control and
28 governance of FAME Corporations. Plaintiffs assert that FAME and its Pastor appoint and

1 control the FAME Corporations, appoint their directors and the Pastor is the Chairman of the
2 Board of each FAME Corporation and their Chief Executive Officer. Defendants dispute this
3 corporate control and governance by FAME. Plaintiffs therefore request a judicial declaration
4 regarding the respective rights, interests and duties of FAME and FAME Corporations. Such a
5 declaration is necessary and appropriate at this time to avoid a multiplicity of actions and enable
6 the parties to conduct themselves appropriately in the future with respect to the relationship
7 between the parties.

8 **SEVENTH CAUSE OF ACTION**

9 **(By all Plaintiffs against all Defendants for an Accounting, Preliminary and**
10 **Permanent Injunction and Appointment of a Receiver)**

11 38. Plaintiffs reallege each allegation of paragraphs 1 through 37, inclusive, of this
12 Complaint as though set forth in full herein.

13 39. Since Defendants are in control of the books and records of Defendants and possess
14 exclusive knowledge of the financial transactions of the Plaintiffs, Plaintiffs are entitled to a full
15 accounting from Defendants. Plaintiffs are entitled to the appointment of a Receiver to take
16 control and possession of, care for, manage and preserve the assets and property of FAME
17 Corporations and the assets and property are in danger of being lost, removed or materially
18 destroyed by Defendants.

19 40.. Plaintiffs are entitled to preliminary and permanent injunctive relief to protect their
20 interests and to prevent irreparable harm to Plaintiffs. Such relief should include, among other
21 things, orders restraining Defendants, their agents, employees, servants and persons acting in
22 concert with them from engaging in the following actions:

23 (a) withdrawing, transferring or otherwise disposing of any funds in any financial
24 accounts of FAME Corporations, or changing the name of any financial accounts of FAME
25 Corporations;

26 (b) disposing of any assets or interests of FAME Corporations;

27 (c) preventing Plaintiffs from access to FAME Corporation facilities;

28 (d) preventing Plaintiffs from access to their books and records;

1 (e) expending any funds except to pay employees and vendors but with the signature of
2 Pastor J. Edgar Boyd;

3 (f) destroying or removing any documents of Plaintiffs; and

4 (g) transferring any title to the property and assets of FAME Corporations.

5 39. Plaintiffs have sustained direct and proximate injury as a result of Defendants'
6 breaches of fiduciary duty and therefore will be permanently and irreparably sustain continued
7 injury in the event this relief is not granted by the Court.

8
9 **WHEREFORE, Plaintiffs pray for judgment to be entered in their favor an against**
10 **each Defendant as follow:**

11 **On the First, Second and Third Causes of Action:**

- 12 a. **For compensatory damages according to proof and at least in excess of \$1**
- 13 **million;**
- 14 b. **For punitive and exemplary damages according to proof;**
- 15 c. **For costs of suit;**
- 16 d. **For disgorgement of unjustly enriched funds;**
- 17 e. **For imposition of a constructive trust;**
- 18 f. **For such other and further relief as the Court deems just and proper.**

19 **On the Fourth Cause of Action:**

- 20 i. **For compensatory damages in the amount of \$49,000;**
- 21 ii. **For costs of suit;**
- 22 iii. **For imposition of a constructive trust;**
- 23 iv. **For disgorgement of unjustly enriched funds;**
- 24 v. **For such other and further relief as the Court deems just and proper.**

25 **On the Fifth Cause of Action:**

- 26 1. **For immediate possession of the property and books and records of Plaintiffs;**
- 27 2. **For costs of suit;**
- 28 3. **For such other and further relief as the Court deems just and proper.**

1 **On the Sixth Cause of Action:**

2 1. For a declaration of the rights and obligations between Plaintiffs and
3 Defendants as set forth in this Complaint;

4 2. For costs of suit;

5 3. For such other and further relief as the Court deems just and proper.

6 **On the Seventh Cause of Action:**

7 1. For an accounting;

8 2. For the appointment of a Receiver;

9 3. For costs of suit;

10 4. For injunctive relief as pleaded herein;

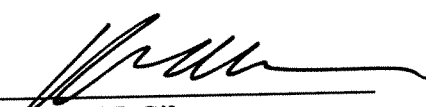
11 5. For imposition of a constructive trust;

12 6. For disgorgement of unjustly enriched funds;

13 7. For such other and further relief as the Court deems just and proper.

14
15
16 Dated: December 4, 2012

LAW OFFICE OF ROBERT M. SILVERMAN

17
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19 By: 

20 Robert M. Silverman
21 Counsel for FAME and
22 FAME Corporations.
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